

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF PENNSYLVANIA**

PUBLIC EMPLOYEES' RETIREMENT
SYSTEM OF MISSISSIPPI, on behalf of itself
and all others similarly situated,

Plaintiff,

v.

MYLAN N.V., HEATHER BRESCH, RAJIV
MALIK, ANTHONY MAURO, and KENNETH
PARKS,

Defendants.

Case No. 2:20-cv-00955-NR

CLASS ACTION

**MOTION OF THE PUBLIC EMPLOYEES' RETIREMENT SYSTEM OF MISSISSIPPI
FOR APPOINTMENT AS LEAD PLAINTIFF AND APPROVAL OF
ITS SELECTION OF LEAD COUNSEL**

The Public Employees' Retirement System of Mississippi ("Mississippi") respectfully moves this Court for the entry of an Order: (i) appointing Mississippi as Lead Plaintiff pursuant to Section 21D(a)(3)(B) of the Securities Exchange Act of 1934, 15 U.S.C. § 78u-4(a)(3)(B), as amended by the Private Securities Litigation Reform Act of 1995 (the "PSLRA"); (ii) approving Mississippi's selection of Bernstein Litowitz Berger & Grossmann LLP ("Bernstein Litowitz") and Kessler Topaz Meltzer & Check, LLP ("Kessler Topaz") as Lead Counsel for the Class; and (iii) granting such other relief as the Court may deem just and proper.

This Motion is made on the grounds that Mississippi believes it is the "most adequate plaintiff" under the PSLRA and should therefore be appointed Lead Plaintiff. Specifically, Mississippi believes it has the "largest financial interest" in the relief sought by the Class in this action by virtue of, among other things, the significant losses it incurred on purchases of hundreds of thousands of shares of Mylan N.V. common stock between February 16, 2016 and May 7, 2019, inclusive. Mississippi also satisfies the requirements of Rule 23 of the Federal Rules of Civil Procedure because its claims are typical of other Class members' claims and because it will fairly and adequately represent the interests of the Class. Moreover, Mississippi is a paradigmatic Lead Plaintiff under the PSLRA because it is a sophisticated institutional investor with a substantial financial stake in the litigation, which guarantees effective monitoring and supervision of counsel.

Mississippi respectfully requests oral argument.

This Motion is supported by the accompanying Memorandum of Law, the Declaration of M. Janet Burkardt and exhibits annexed thereto, the pleadings and other filings herein, and such other written or oral argument as may be permitted by the Court.

WHEREFORE, Mississippi respectfully requests that the Court: (i) appoint Mississippi to serve as Lead Plaintiff; (ii) approve Mississippi's selection of Bernstein Litowitz and Kessler

Topaz as Lead Counsel for the Class; and (iii) grant such other relief as the Court may deem just and proper.

DATED: August 25, 2020

Respectfully submitted

WEISS BURKARDT KRAMER LLC

/s/ M. Janet Burkardt

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and Proposed Lead Counsel for the Class*

CERTIFICATE OF SERVICE

I hereby certify that on August 25, 2020, a copy of the foregoing was filed electronically with the Clerk of the Court using the CM/ECF system. Notice of this filing will be sent to counsel of record by operation of the Court's CM/ECF automated filing system.

/s/ M. Janet Burkardt

M. Janet Burkardt (PA. I.D. #85582)